

**BEFORE THE HEARING EXAMINER
FOR THE CITY OF ISSAQUAH**

In the Matter of the Application of)	No. FP15-00004
)	
Eric Clarke, on behalf of)	Providence Ridge Final Plat
Providence Ridge, LLC)	
)	
)	FINDINGS, CONCLUSIONS,
<u>For Approval of a Final Plat</u>)	AND DECISION

SUMMARY OF DECISION

The Hearing Examiner **APPROVES** the Providence Ridge Final Plat. Conditions are necessary to address specific impacts of the proposed use.

SUMMARY OF PUBLIC MEETING

Meeting Date:

The Hearing Examiner held a public meeting on the request on December 16, 2016.

Comment:

The following individuals provided comments at the public meeting:

Christopher Wright, City Development Services Project Oversight Manager
Eric Clarke, Applicant Representative
Doug Schlepp, City Engineer
Doug Beaman
Patricia Martin
David Kappler

Exhibits:

The following exhibits were submitted at the public meeting:

1. Vicinity Map, undated
2. Land Use Permit Application, dated December 16, 2015
3. Preliminary Plat Plans:
 - a. Boundary/Topography Map (Sheet 1 of 6), dated August 29, 2013
 - b. Site Plan (Sheet 2 of 6), dated February 4, 2014
 - c. Conceptual Road/Grading Plan (Sheet 3 of 6), dated August 29, 2013
 - d. Road Profiles (Sheet 4 of 6), dated August 29, 2013
 - e. Conceptual Utility Plan (Sheet 5 of 6), dated August 29, 2013
 - f. Tree Retention Plan (Sheet 6 of 6), dated August 29, 2013

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4. Hearing Examiner Findings, Conclusion, and Decision for preliminary plat, dated May 22, 2014
5. Final Plat Plan Sheets:
 - a. Recording Certificate (Sheet 1 of 6), dated December 1, 2016
 - b. Tract Notes (Sheet 2 of 6), dated December 1, 2016
 - c. West Section of Plat (Sheet 3 of 6), dated December 1, 2016
 - d. East Section of Plat (Sheet 4 of 6), dated December 1, 2016
 - e. Open Space and Tree Retention Areas (Sheet 5 of 6), dated December 1, 2016
 - f. Easements and Trails (Sheet 6 of 6), dated December 1, 2016
6. Notice of Public Meeting, dated November 22, 2016
7. Letter from Sheldon Lynne to Keith Niven, dated December 6, 2016, with attached information on performance bonding
8. Staff Report, dated December 16, 2016

The Hearing Examiner enters the following findings and conclusions based upon the comments offered and exhibits admitted at the public meeting.

FINDINGS

Application and Notice

1. Eric Clarke, on behalf of Providence Ridge, LLC (Applicant), requests approval of a final plat to subdivide approximately 12 acres into 38 single-family residential lots and 13 tracts for critical areas, open space/tree retention, stormwater detention, access and utilities, and landscaping. The property is located on the south side of SE 43rd Way, to the south and west of the existing Providence Point development. The property would be accessed off of SE 43rd Way.¹ *Exhibit 2; Exhibit 5; Exhibit 8, Staff Report, page 2.*
2. The City of Issaquah (City) determined that the Final Plat application was complete on December 17, 2015. On November 22, 2016, the City mailed notice of the application and associated public meeting to all parties of record to the preliminary plat, as required by Issaquah Municipal Code (IMC) 18.13.200.A. *Exhibit 6; Exhibit 8, Staff Report, page 2.*

Environmental Review

3. The City acted as lead agency and analyzed the environmental impacts of the proposal, as required by the State Environmental Policy Act (SEPA), Chapter 43.21C RCW, during

¹ The subject property is identified by Tax Assessor Parcel No. 162406-9103. A legal description of the property is found within the proposed Final Plat drawings submitted with the Final Plat application. *Exhibit 5a; Exhibit 8, Staff Report, page 1.*

the preliminary plat approval process. Accordingly, no further SEPA review is necessary for final plat approval.² *Exhibit 8, Staff Report, page 2.*

Comprehensive Plan and Zoning

4. The property is designated Low Density Residential (LDR) by the City Comprehensive Plan. The purpose and intent of the LDR designation is:

to provide a variety of housing types and densities within a full range of urban services. The primary use in this designation is housing. The appropriate density of the individual residential zoning districts is based on the availability of urban services and the proximity to local streets, arterials and pedestrian access. Those areas with critical areas shall be appropriate for low density residential, with the intent to protect environmentally critical areas from impacts associated with more intensive development. These environmentally critical areas are valued as a community resource, both for conservation purposes and public enjoyment; provided, that the environmentally critical areas are protected, low density single family residential use may be appropriate.

City of Issaquah Comprehensive Plan, Table L-3 – Land Use Designations: Purpose and Intent, page L-11. Exhibit 8, Staff Report, page 2.

5. The property is located within the City's Single Family Small Lot (SF-SL) zoning district. The purpose of the SF-SL zone is to:

provide for single family neighborhoods which are in close proximity to low density multifamily neighborhoods and urban services. The district may include some of the historic plats of Issaquah. Appropriate areas for this district include those neighborhoods which are currently medium density single family or would be suitable because of the compatibility to surrounding densities and proximity to urban services. Permitted uses include single family homes, assisted living facilities and senior housing. Recreational uses which serve the neighborhood and urban services are also permitted; provided, that traffic and other related impacts are not detrimental to the district. . . . [T]he following objectives also apply to this district:

1. Establish and preserve residential neighborhoods;
2. Encourage the reuse and remodeling, rather than demolition, of historic buildings to provide alternative housing opportunities;
3. Provide opportunities for single family residential development in areas served by public and urban services.

Issaquah Municipal Code (IMC) 18.06.100.D. Exhibit 8, Staff Report, page 2.

² As noted by the Washington Supreme Court, "SEPA does not mandate bureaucratic redundancy but only that the heretofore ignored environmental considerations become part of normal decision making on major actions." *Lovelace v. Yantis*, 82 Wn.2d 754, 765 (1973).

6. The SF-SL zoning designation allows for single-family residential development at a maximum density of 7.26 dwelling units per acre. *IMC Table 18.07.360*. The proposed site is constrained by environmental critical areas, including steep slopes, wetlands, and wetland buffers. Specifically, steep slopes encumber much of the southern boundary of the plat and there is a wetland, “Wetland C,” near the southeast corner of the plat. To avoid directly impacting critical areas or buffers, the proposed development area is concentrated on six acres of the 12-acre site. Critical areas and associated buffers, including steep slopes, wetlands, and streams, which cannot be developed, receive partial density credit, which may then be transferred to the developable area of the site. *IMC 18.10.450.B.2*. An area equal to 4.28 acres, or 35.5 percent of the total site area, consists of critical areas and buffers. The City code allows for a 70 percent density credit when 31 to 40 percent of the proposed site is encumbered with critical areas. *IMC 18.10.450.B.2*. Accounting for density credit, the site’s proposed 42 lots fall below the allowable maximum density. *Exhibit 3; Exhibit 6; Exhibit 8, Staff Report, page 7*.
7. The Providence Point senior housing development is located to the north of the proposed site, across SE 43rd Way, and adjacent to the east. Providence Point includes a variety of housing types, including single-family detached and attached residences. Lands to the south and west of the site are undeveloped and owned by the State. A steep ravine to the south of the site slopes down to Laughing Jacobs Creek, which flows west into Lake Sammamish. *Exhibit 4; Exhibit 5*.

Project Background

8. A preliminary plat application was submitted for the site in November 2013. The City’s Hearing Examiner held an open record hearing on the proposed preliminary plat on May 12, 2014. On May 22, 2014, the Hearing Examiner recommended approval of the preliminary plat, with 30 conditions. The Applicant submitted construction permits for clearing/grading, road construction, and utilities and began constructing plat infrastructure in October 2014. The Applicant has not proposed any significant changes from the approved preliminary plat. *Exhibit 2; Exhibit 4; Exhibit 5; Exhibit 7; Exhibit 8, Staff Report, pages 2 and 3*.

Preliminary Plat Conditions

9. Conditions placed on the preliminary plat approval for Providence Ridge, No. PP13-00005, apply to this Final Plat proposal. City staff reviewed the Final Plat application for consistency with the conditions of preliminary plat approval, as approved by the City Council. The applicable preliminary plat conditions are numbered below, followed by the City staff’s analysis in italics stating how the proposed final plat complies with each of the conditions:
 1. The Applicant shall provide details of the intermittent stream crossing to ensure the bridge design spans the ordinary high water mark, is adequately designed for

high flows, and to quantify the enhancement planting relative to the stream buffer impact. Plans shall be submitted and approved by the City prior to issuance of construction permits.

The required trail has been relocated so that no stream crossing is required. Landscape plans have been submitted that quantify enhancement plantings relative to the stream buffer impact.

2. All cited geotechnical design requirements, recommendations, and development practices specified in the Liu and Associates geotechnical reports and the Geotechnical Engineering Slope Stability Analysis by E3RA shall be followed. This shall be reviewed on construction plans and approved by the City prior to issuance of construction permits.

Site civil design utilized and incorporated the geotechnical design requirements, recommendations and development practices as specified in the geotechnical reports. The studies were available and reviewed by City staff during the review of construction permits.

3. Walls shown on the plans shall be designed/engineered as retaining structures, rockeries are not considered to be retaining structures. This shall be reviewed on construction plans and approved by the City prior to issuance of construction permits.

All retaining structures were designed by a licensed geotechnical engineer, and these designs were reviewed and approved by the City.

4. An interceptor trench drain shall be provided, consistent with the recommendations in the Liu and Associates geotechnical reports. This shall be reviewed on construction plans and approved by the City prior to issuance of construction permits.

The above mentioned interceptor trench has been provided per the Liu and Associates reports, and approved by the City.

5. The Applicant shall construct a stormwater system that complies with the Sensitive Lake Overlay and Enhanced Water Quality Treatment requirements identified by the Applicant. The City agrees to maintain this system.

The stormwater system has been designed to comply with the standards, has been reviewed and approved by the City, and is currently under construction.

6. Detailed design of structures and retaining walls shall be reviewed for compliance with code criteria in IMC 18.10.580, prior to issuance of building or construction permits.

IMC 18.10.580 includes criteria for factors of safety. Structures and retaining walls have been designed and reviewed to meet the code standards.

7. The Applicant shall submit a geotechnical report evaluating specific building plans and grading plans prior to the issuance of construction and building permits. The geotechnical report shall follow City of Issaquah Development Services "Soils Report Requirements." A third-party independent review of the geotechnical report may be required at the Applicant's expense.

Such reports have been completed and the recommendations in the report have been and will continue to be followed.

8. The tree retention areas located on Lots 13-39 shall be preserved by recording a tree protection easement on the lots. The tree protection easement shall be required on final plat drawings and shall be written to benefit the City.

A tree retention covenant is provided on the final plat to protect trees within the tree retention area on the back of Lots 12-35. The covenant references the Native Growth Protection Areas (NEGPA) restrictions on Sheet 2 of 6 [Exhibit 5b]. The open space/tree retention areas on Lots 12-35 are shown on Sheet 5 of 6 [Exhibit 5e].

9. Approved tree protection measures shall be in place prior to any other construction or demolition activities. Such measures may be installed in conjunction with limits of clearing and grading delineation.

Tree protection measures were installed prior to any construction or demolition activities.

10. Channelization improvements on SE 43rd Way are necessary for safe and efficient access and egress into the site, including adding a right turn pocket into the site, a center merge pocket, and a left turn pocket for vehicles entering the site from the east. Channelization plans for SE 43rd Way shall be approved by the City prior to issuance of construction permits.

Channelization plans for SE 43rd Way were provided with construction permits and included the above improvements. The channelization plans were approved by the City prior to issuance of construction permits.

11. Traffic calming devices for SE 43rd Way, such as a raised median, traffic buffers, and speed enforcement measures, shall be considered prior to issuance of building permits.

These measures have been considered in the channelization plans. In addition, the City is considering these measures as part of a capital improvement project on SE 43rd Way at the intersection with Providence Point Drive SE.

12. The Applicant shall mitigate for potential impacts on public services with a voluntary contribution for the General Government Buildings and Police Mitigation Fees. The mitigation fee shall be paid prior to issuance of building permits; the actual fee amount shall be determined at the time of payment.

The SEPA mitigation fee for General Government and Police will be paid at the time of issuance of building permits.

13. The Applicant shall apply for a Site Work Permit to construct the roads, utilities and grading of the lots. A final plat review will follow after subdivision infrastructure has been installed or bonded for prior to recording.

Site work permits have been issued for road construction, utilities, and grading of the lots. Plat improvements that have not yet been completed (deferred improvements) are included in a performance bond, as allowed in IMC 18.13.280. The improvements that are bonded, the values of those improvements, and the approval letter by the Public Works Director are provided in Exhibit 7.

14. Where side yard setbacks are less than 5 feet, the building code requires fire resistant wall construction, limited wall openings, etc. This will be reviewed with building permits.

Building code requirements will be applied with the review of building permits.

15. The 50 percent impervious surface limit must be met on each of the lots; this requirement will be reviewed and verified with building permits.

The impervious surface limit will be reviewed on building permits for each lot.

16. The trail located along the back of Lots 13-39, in the tree retention area, shall be field-located to avoid impacts and removal of significant trees. The trail alignment shall be approved by the Development Services Department prior to trail construction. A trail easement shall be recorded on the final plat to ensure

access for all residents.

The trail alignment has been located to avoid impacts and removal of significant trees. The public trail along the back of Lots 12-35 is shown on Sheet 6 of 6 of the final plat [Exhibit 5f]. The public trail easement is included as easement provision #6 on Sheet 2 of 6 [Exhibit 5b].

17. A public trail will connect the sidewalk on SE 43rd Way through the development's open space/critical area tract to connect to the regional East Plateau Trail or Laughing Jacobs Trail, which follows the alignment of the existing sanitary sewer trunk line and associated access road. A public access easement for the trail connection shall be provided on the final plat. A wayfinding sign shall be provided along SE 43rd Way to indicate public trail access.

Sheet 6 of 6 [Exhibit 5f] shows the 5-foot public trail through Tract M, connecting the sidewalk on SE 43rd Way to the regional trail. The public trail easement is included as easement provision #6 on Sheet 2 of 6 [Exhibit 5b]. The public access wayfinding sign along SE 43rd Way has been required on the site works permit.

18. With reduced front yard building setbacks, driveways may not be of sufficient length to allow for parking because cars would overhang onto sidewalks impeding pedestrians or encroach into the street where sidewalks are not provided which could obstruct emergency access. Therefore, driveways shall provide a length of at least 18 feet on-site if intended for parking or shall be less than eight feet in length to clearly indicate they are not designed to accommodate parking. This requirement shall be reviewed with building permits.

This requirement shall be reviewed with building permits for each lot.

19. The Applicant shall monitor the tree retention area for a minimum of 3 years. Where trees in the tree retention areas are lost to blowdowns or need to be removed as hazard trees, the Applicant shall plant replacement trees consistent with the City's landscape code for replacement trees, IMC18.12.1390.

This condition will be assessed and implemented upon completion of grading and site improvements.

20. No trees are to be damaged or removed, except as shown on approved plans or as is determined to be unsafe by a certified arborist with a tree risk assessment

qualification.

The tree retention areas are designated outside clearing and grading limits to prevent tree damage or removal. Prior to grading, the City's arborist reviewed trees along the clearing/grading limit and approved trees that could be removed due to hazard tree risk.

21. All homes located over 150 feet from an approved fire apparatus turnaround shall have a fire sprinkler system installed.

This condition will be required, if applicable, by Eastside Fire & Rescue with their review of building permits.

22. To maintain fire and emergency access, the roads shall be signed for "no parking, fire lane."

This condition will be implemented with the completion of infrastructure construction.

23. Eastside Fire & Rescue (EF&R) allows a 15 percent maximum grade for fire department access roads. The Applicant shall provide a letter from a WA State Engineer to EF&R stating that the final grade will not exceed 15 percent. Otherwise, the installation of an NFPA 13D fire sprinkler system may be required for the homes accessed from project roads.

This condition will be implemented prior to the completion of the infrastructure.

24. The north side of Road 'A' does not include a planter strip and sidewalk. Houses setback three feet from the road lack adequate, safe back-out distance from garages and/or potentially for pedestrians leaving houses. Therefore, the setbacks for houses on the north side of Road 'A' shall be a minimum of 5 feet.

This condition will be required with the review of building permits for houses located on the north side of Road 'B' (Road 'A' on preliminary plat plans).

25. To encourage unifying features to foster community, the front doors of all residences shall be visible and clearly oriented to the street. This will be reviewed with building permits.

This condition will be required with the review of building permits.

26. To minimize the predominance and visibility of residential garages, the garages shall be recessed or setback from the front door entries to the residences. This will be reviewed with building permits.

This condition will be required with the review of building permits.

27. To support pedestrian activity within the development, there shall be a clear pedestrian path between the front door of the residences and the sidewalk or street, separate from the driveway. This will be reviewed with building permits.

This condition will be required with the review of building permits.

28. With the proposed narrow lots, driveway widths could dominate front yards. Driveway cuts along the streets shall be limited to a 16-foot width and driveway widths limited to 18-feet. This will be reviewed with building permits.

This condition will be required with the review of building permits.

29. Impact fees are required for each new single-family residence. The following impact fees will be required and the applicable cost calculated at the time of issuance of building permits for each residential unit: Transportation, Fire, Schools, Parks, General Government (SEPA), Police (SEPA).

The required impact fees will be required and paid with issuance of building permits for each new residence.

30. The following critical area regulation conditions shall apply prior to issuance of the final plat:

- 1) Permanent survey stakes shall be set to delineate the boundaries between critical area tracts and adjoining lots.

Critical areas are shown on the final plat in separate tracts and permanent survey stakes will be set to delineate the boundaries from adjoining lots.

- 2) Signs between critical area tracts and adjacent lots shall be installed, explaining the type and value of the critical area.

Critical area signs are shown on landscape plans included in the site works permit.

- 3) The final plat shall include language to protect the critical area tracts from development in perpetuity.

This language has been included on the final plat.

Exhibit 8, Staff Report, pages 5 to 10.

Staff Recommendation and Public Meeting

10. City staff reviewed the proposed final plat for compliance with the technical requirements in IMC 18.13.180 through IMC 18.13.340, which govern the final plat application, the general and specific requirements of the final plat, the dedications and certifications contained in the final plat or to accompany the final plat, and the requirements of Chapter 58.17 RCW. City staff determined that all of these requirements are satisfied, and recommended approval of the final plat. Staff noted that, since obtaining preliminary plat approval, the Applicant reduced the total number of lots for the proposal from 42 to 38 and that all other changes meet the requirements or thresholds for minor deviations under the code.³ *Exhibit 8, Staff Report, pages 2 to 10.*
11. Under IMC 18.13.280, the Hearing Examiner may not approve a final plat until all required improvements are constructed in a satisfactory manner and approved by the responsible City departments, or sufficient bond has been satisfactorily posted in lieu of completion. The City Public Works Director must notify the City Planning Department in writing of the improvements deferred; the amount of bond or other security, and the time limit of each; and any other pertinent information. *IMC 18.13.280.G.* Sheldon Lynne, City Public Works Engineering Director, stated in a December 6, 2016, letter to Keith Niven, Economic and Development Services Director, that the developer has deferred some plat improvements and that the necessary bond amounts have been determined. *Exhibit 7.*
12. At the public meeting, Development Services Project Oversight Manager Christopher Wright discussed the history of the Providence Ridge plat (as described above). Mr. Wright stated that the final plat is basically unchanged from the approved preliminary plat, apart from the reduction in lots from 42 to 38, and that City staff recommends approval of the final plat with standard proposed conditions of final plat approval that would ensure the Applicant obtains necessary signatures of City representatives on the final plat, properly records the final plat, and properly submits copies of the final plat to the appropriate City departments. City staff also recommends that the Applicant provide a 3-year monitoring/maintenance bond for on-site landscaping. Applicant Representative Eric Clarke stated that the Applicant agrees with the City's proposed conditions. He noted that the Applicant is nearly complete with all infrastructure development and that

³ Reducing (as opposed to increasing) the number of lots on a preliminary plat does not trigger provisions for a major plat modification under IMC 18.13.200.

they have bonds in place to cover all unfinished improvements. *Comments of Mr. Wright; Comments of Mr. Clarke.*

13. Area resident Doug Beaman stated that he lives in the adjacent Providence Point development and is interested in access to and from the Providence Ridge development, as well as whether sidewalks, bike lanes, and trails would be included with the development. Patricia Martin expressed similar concerns. *Comments of Mr. Beaman; Comments of Ms. Martin.*
14. David Kappler, an area resident representing the Issaquah Trails Club, noted that there are internal trails within the plat and that the City is still working to develop a regional trail system that would connect area trails to the East Lake Sammamish Trail. *Comments of Mr. Kappler.*
15. City Engineer Doug Schlepp explained that the City has widened SE 43rd Way and that the Applicant would construct a sidewalk and restore the bike lane along the frontage of the street. A center turn lane would allow for safe ingress and egress to Providence Ridge as well as a deceleration right hand turn lane into the development. Mr. Schlepp also noted that there would be a wayfinding sign directing the public to the community trail within the development. He reiterated that the City wishes to expand the trail system beyond the limits of the project in the future but that the trail would not continue into the Providence Point community. *Comments of Mr. Schlepp.*

CONCLUSIONS

Jurisdiction

The Hearing Examiner has jurisdiction to hear and decide final plat applications pursuant to Issaquah Municipal Code (IMC) 18.04.490.C.2 and 18.13.200. A final plat is reviewed at a public meeting and does not require review at an open record hearing. *IMC 18.04.470.B.*

Criteria for Review

The Hearing Examiner shall review the final plat and all documents including any public comments and approve the final plat if the final plat:

1. Except for minor modifications under IMC 18.13.160, Modification of an approved final plat, is consistent with the approved preliminary plat; and
2. Is consistent with the provisions of this title and Chapter 58.17 RCW.

IMC 18.13.200.B.

These criteria include the criteria for review of plats set forth in RCW 58.17.110, the state subdivision statute. The City Council and Hearing Examiner addressed consistency of the application with RCW 58.17.110 criteria during preliminary plat review. *See Exhibit 4.* As a

result of preliminary plat review, the Hearing Examiner approved the preliminary plat with 30 conditions. *See Exhibit 4.* Because the application has already undergone review for consistency with the applicable subdivision criteria, and conditions of approval were applied to ensure consistency, final plat review is limited to determining whether conditions of preliminary plat approval and Chapter 18.13 IMC technical requirements are satisfied.

Conclusions Based on Findings

1. **With conditions, the proposed final plat would comply with Chapter 18.13 IMC technical requirements.** The City gave reasonable notice of the final plat application and associated public meeting. The City, through the preliminary plat process, previously reviewed the environmental impacts of developing the property, as required by SEPA. The Applicant has generally complied with Chapter 18.13 IMC technical requirements, including dedications and certifications, improvements, and financial guarantees on deferred improvements. Conditions are necessary to ensure that the Applicant provides a monitoring/maintenance bond for landscape improvements, includes necessary signatures of City representatives on the final plat, properly records the final plat, and properly submits copies of the final plat to City departments. *Findings 1 – 15.*
2. **The final plat would comply with the applicable conditions of preliminary plat approval.** The residential development proposed for the subject property is consistent with the Comprehensive Plan's Low Density Residential designation. The proposed development is consistent with the purpose and requirements of the Single Family Small Lot zone. The application for final plat approval was adequately reviewed for compliance with the conditions of the preliminary plat approval. Completion of required improvements is guaranteed through posting of a performance bond by the Applicant. Appropriate provision has been made for the public health, safety, general welfare, and all other items specified in IMC 18.13.310. *Findings 1 – 15.*

DECISION

Based on the preceding findings and conclusions, the final plat for Providence Ridge is **APPROVED**, with the following conditions:

1. The Applicant shall provide a 3-year landscape bond, after approval of the landscape installation, consistent with IMC 18.12.160.
2. Minor, non-substantive adjustments may be made to the Final Plat at the discretion of the Director of the Development Services Department, prior to recording of the Final Plat mylars.
3. Prior to the Applicant recording the Final Plat with King County, the necessary signatures of City representatives must be signed on the mylar sheets.

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4. The Applicant shall record the approved Final Plat with the King County Department of Records and Elections.
5. A copy of the recorded Final Plat packages shall be provided to the Development Services Department within ten (10) days of recording with the King County Department of Records and Elections. The Applicant shall also submit an electronic copy of the plats in a format acceptable to the Public Works Department.

Decided this 3rd day of January 2017.



Andrew M. Reeves
Hearing Examiner
Sound Law Center